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Remarks/ Arguments

In response to the Office Action mailed May 5, 2005, Applicants respectfully request that the Examiner reconsider the rejections of the claims. Applicants note with appreciation the allowability of current Claims 41 and 43.

Claims 21, 24 - 28, 31 - 36, 38 - 40, and 44 - 48 remain.
Claims 21 - 48 are being amended.

The Examiner has indicated that the Claims should be renumbered, and several of the dependencies corrected. In accordance with the Examiner's suggestion, the claims have been renumbered as Claims 21 - 48. The dependences have also been corrected.

Claims 21, 24 - 28, 31 - 36, 38 - 41, and 44 – 48 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Maesato.* (U.S. Patent 5,175,621) (hereinafter "the *Maesato* reference"). Applicants respectfully traverse these rejections.

Anticipation rejections under 35 U.S.C. § 102(e) require identity of invention. In other words, each and every feature of each and every claim rejected as anticipated must be found in a single prior art reference. In contrast to the present claims, the *Maeseto* reference does not teach either: (1) the selection of a pair of gamma correction curves from a plurability of at least three gamma correction curves in response to a desired gamma value; or (2) the selection of gain values from one of a plurality of sets of gain matrices in response to the input value.

Instead, the *Maeseto* reference teaches a system in which the input value is used to select gamma corrected data values and a coefficient k is selected in response to the desired gamma value. Specifically, the input value x indexes a pair of tables which produce two output values corresponding to the gamma functions x^A and x^B, in which A and B are gamma coefficients. (See, the *Maeseto* reference, Abstract and

Figures 1 and 3A). There is no teaching that these gamma functions are selected from a larger plurality of gamma functions in response to the desired gamma value.

The output values x^A and x^B are then multiplied by the coefficients k and (k – 1), respectively. The coefficient k is selected based on the system gamma value, as shown in Figure 2A of the *Maeseto* reference. The *Maeseto* reference does not teach that the k coefficient could be generated or selected as a function of the input value.

In sum, the *Maeseto* reference does not teach selecting one of a set of gain matrices dynamically in response to an input data value and the selecting a pair of gain values from the selected set of gain matrices in response to the desired gamma value. The *Maeseto* reference only discloses selection of a single gain point (k) in response to the desired gamma value. Therefore, Applicants respectfully submit that the Examiner has not met his burden of proving a *prima facie* case of anticipation, and therefore that the rejections of Claims 21, 24 - 28, 31 - 36, 38 - 40, and 44 – 48 should be withdrawn.

No new matter has been added; the claims have been merely amended to more particularly claim the subject matter Applicants believe is inventive. Applicants respectfully submit that the Claims as they now stand are patentably distinct over the art cited during the prosecution thereof.

With the addition of no new claims, no additional filing fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account Number 20-0821 of Thompson & Knight LLP.

If the Examiner has any questions or comments concerning this paper or the present application in general, the Examiner is invited to call the undersigned at (214) 969 - 1749.

Respectfully submitted,

Thompson & Knight LLP
Attorneys for Applicant

By:

021615 500139 DALLAS 2043019.1

ATTORNEY DOCKET NO
1434 - CA

PATENT
U.S. 10/685,128

James J. Murphy
Reg. No. 34,503

1700 Pacific Avenue
Suite 3300
Dallas TX. 75201 - 4693
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